

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                |   |                          |
|--------------------------------|---|--------------------------|
| UNITED STATES SECURITIES AND   | ) |                          |
| EXCHANGE COMMISSION,           | ) |                          |
|                                | ) |                          |
| Plaintiff,                     | ) | Case No. 1:13-CV-00982   |
|                                | ) |                          |
| v.                             | ) |                          |
|                                | ) | District Judge St. Eve   |
| A CHICAGO CONVENTION           | ) | Magistrate Judge Rowland |
| CENTER, LLC, ANSHOO SETHI, and | ) |                          |
| INTERCONTINENTAL REGIONAL      | ) |                          |
| CENTER TRUST OF CHICAGO, LLC,  | ) |                          |
|                                | ) |                          |
| Defendants.                    | ) |                          |

**DEFENDANTS' UNOPPOSED MOTION TO  
MODIFY THE ASSET FREEZE ORDER**

Defendants A Chicago Convention Center, LLC, Anshoo Sethi, and Intercontinental Regional Center Trust of Chicago, LLC (“Defendants”) respectfully request that the Court modify the Asset Freeze Order entered on February 20, 2013 (Dkt. No. 27) to unfreeze certain funds existing in Pacific Global Bank, account number 000105347 (the “Account”), which belong to Ravinder Sethi’s pharmacy business, East Calumet Health Services, Inc. The funds in the Account do not include funds belonging to investors and they have no relation to the underlying matters at issue in this litigation. In support of their motion, Defendants state as follows:

1. For many years, Ravinder Sethi has operated a pharmacy by the name of East Calumet Health Services, Inc.
2. East Calumet Health Services, Inc. is not a defendant in this action nor does it have anything to do with the matters at issue in this litigation.

3. In 2004, Ravinder Sethi made Anshoo Sethi a signatory for the Account in the event Ravinder ever became incapacitated. However, Anshoo Sethi has never deposited to, withdrawn from, or otherwise used the Account.

4. The Account was frozen pursuant to the Court's February 20, 2013 Asset Freeze Order purely because Anshoo Sethi was listed as a signatory on the Account.

5. Defendants have provided the SEC with proof that the funds in the Account are completely independent from the matters at issue in this case, including i) a detailed analysis of each deposit over five thousand dollars (\$5,000.00) that went into the Account, ii) the bank statements, deposit tickets and check images supporting that analysis, iii) an affidavit from Pacific Global Bank establishing the authenticity and completeness of the aforementioned records, and iv) the Illinois Comptroller's payment history to the Account for State of Illinois Medicaid payments.

6. The SEC has raised a question regarding two deposits to the Account, totaling \$12,567.73, which originated from Happy Days Day Care, and Ranjna Sethi, respectively. Happy Days Day Care is owned by Ravinder and Ranjna Sethi.

7. To avoid delay in unfreezing the funds in the Account, Defendants have agreed to leave frozen \$12,567.73 in the Account, and will address the issue with the SEC in relation to a later effort to unfreeze the Happy Days Day Care account.

8. The SEC has determined not to oppose the relief sought herein.

WHEREFORE, Defendants respectfully urge this Honorable Court to grant their Unopposed Motion to Modify the Asset Freeze Order, to enter the Proposed Order submitted concurrently with this Motion, and to grant them such other and further relief as this Court deems just and proper.

Respectfully submitted,

A CHICAGO CONVENTION CENTER,  
LLC, ANSHOO SETHI, and  
INTERCONTINENTAL REGIONAL  
CENTER TRUST OF CHICAGO, LLC

Dated: May 7, 2013

/s/ Scott Mendeloff

Scott Mendeloff (ARDC No. 6184901)  
Arthur Don (ARDC No. 3121678)  
Jason B. Elster (ARDC No. 6289434)  
GREENBERG TRAURIG, LLP  
77 West Wacker Drive, Suite 3100  
Chicago, Illinois 60601  
Tel: 312.456.8400

*Attorneys for Defendants*